BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2001

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY Docket No. R2001-1

RESPONSE OF POSTAL SERVICE WITNESS SCHERER TO INTERROGATORY OF DOUGLAS F. CARLSON (DFC/USPS-T30-1)

The United States Postal Service hereby provides the response of Postal Service witness Scherer to the following interrogatory of Douglas F. Carlson: DFC/USPS-T30-1, filed on October 1, 2001.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Piaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993 Fax –5402 October 15, 2001

RESPONSE OF POSTAL SERVICE WITNESS SCHERER TO DOUGLAS F. CARLSON INTERROGATORIES

DFC/USPS-T30-1. For Priority Mail, please provide available data from the most-recent year for which data are available that show, by ounce, the volume of Priority Mail for each type of Postal Service-supplied mailing envelope or container.

RESPONSE:

I am informed that Priority Mail volume data by weight increment are not available for the various types of Postal Service-supplied mailing envelopes and containers. The distribution by ounce increment of flat-rate-envelope volume in GFY 2000 is available, however. Applying this distribution to total estimated flat-rate-envelope volume in GFY 2000 of 121,962,784 pieces (see Attachment A, page 1 of my testimony) results in the following:

Weight	Volume Distribution	Distributed Volume
0-1 Ounces	2.44%	2,979,408
1-2 Ounces	17.49%	21,326,196
2-3 Ounces	11.17%	13,622,183
3-4 Ounces	7.60%	9,266,982
4-5 Ounces	5.92%	7,225,323
5-6 Ounces	5.02%	6,117,798
6-7 Ounces	4.23%	5,158,869
7-8 Ounces	3.66%	4,464,899
8-9 Ounces	3.08%	3,761,862
9-10 Ounces	3.04%	3,712,707
10-11 Ounces	2.64%	3,216,218
11-12 Ounces	2.39%	2,918,409

RESPONSE OF POSTAL SERVICE WITNESS SCHERER TO DOUGLAS F. CARLSON INTERROGATORIES

Weight	Volume Distribution	Distributed Volume
12-13 Ounces	2.39%	2.917,509
13-14 Ounces	2.45%	2,982,174
14-15 Ounces	2.34%	2,859,749
15-16 Ounces	2.42%	2,957,062
16-17 Ounces	2.13%	2,598,043
17-18 Ounces	2.00%	2,439,282
18-19 Ounces	1.97%	2,405,114
19-20 Ounces	1.39%	1,693,356
20-21 Ounces	1.40%	1,710,879
21-22 Ounces	1.17%	1,423,205
22-23 Ounces	1.09%	1,333,876
23-24 Ounces	1.01%	1,227,045
24-25 Ounces	0.97%	1,187,180
25-26 Ounces	0.79%	968,175
26-27 Ounces	0.81%	991,927
27-28 Ounces	0.64%	775,991
28-29 Ounces	0.60%	729,237
29-30 Ounces	0.50%	605,418
30-31 Ounces	0.54%	659,642
31-32 Ounces	0.48%	586,900
Over 32 Oz.	4.21%	5,140,167

DECLARATION

I, Thomas M. Scherer, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

THOMAS M. SCHERER

Dated: 17-15-01

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Richard T. Cooper

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